

Andrea D. Coit, OSB #002640
acoit@eugenelaw.com
Jonathan M. Hood, OSB #133872
jhood@eugenelaw.com
HUTCHINSON COX
940 Willamette Street, Suite 400
P.O. Box 10886
Eugene, Oregon 97440
Telephone: (541) 686-9160
Facsimile: (541) 343-8693
Of Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION

KATIE M. KONONEN,
Plaintiff,

Case No. 6:21-CV-00179-MK

JOINT MOTION FOR STAY

v.

CITY OF SALEM HOUSING AUTHORITY,
Defendant.

LR 7-1(a)(1) CERTIFICATION

The undersigned attorney certifies that the parties have conferred and join in this motion.

MOTION

The parties move the Court for an order staying this case for 180 days in order to implement the settlement of this case.

This case was settled January 24, 2024, after three settlement conferences with Magistrate Judge Mark Clarke, subject to the execution of a settlement agreement. ECF Doc. 61. The settlement agreement was signed February 27, 2024.

The settlement involves the parties working together to relocate Plaintiff into other housing. That process will take several months, and certain steps will likely require the involvement and consent of non-parties. The parties are optimistic that it can be completed within 180 days, but may request an additional stay if significant progress has been made and more time is needed due to circumstances beyond the parties' control.

If the settlement is successfully implemented, then the parties will request that this case be dismissed. If the settlement is not successfully implemented, then the parties will request that the stay be lifted and that this case proceed.

The Court should therefore order that this case be stayed 180 days.

DATED this 29th day of February, 2024.

HUTCHINSON COX

By: s/Andrea D. Coit
Andrea D. Coit, OSB #002640
Jonathan M. Hood, OSB #133872
Of Attorneys for Defendant

CERTIFICATE OF SERVICE

I certify that on February 29, 2024, I served or caused to be served a true and complete copy of the foregoing **JOINT MOTION FOR STAY** on the party or parties listed below as follows:

- ☒ Via CM / ECF Filing
- ☐ Via First Class Mail, Postage Prepaid
- ☐ Via Email
- ☐ Via Personal Delivery
- ☐ Via Facsimile

Steven M. Wilker
steven.wilker@tonkon.com
Gracey Nagle
gracey.nagle@tonkon.com
Tonkon Torp LLP
888 SW Fifth Avenue, Suite 1600
Portland, OR 97204
Fax: (503) 274-8779
Of Attorneys for Plaintiff

HUTCHINSON COX

By: s/Andrea D. Coit
Andrea D. Coit, OSB #002640
Jonathan M. Hood, OSB #133872
Of Attorneys for Defendant